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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
No. 5:24-cv-00477**

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**PERDUE FARMS INC.,**

Plaintiff,

v.

**JULIE SU**, in her official capacity as Acting  
Secretary of the U.S. Department of Labor, et al.,

Defendants.

**MOTION FOR PRELIMINARY  
INJUNCTION**

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**PLAINTIFF PERDUE FARMS INC.'S  
MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Perdue Farms Inc. (“Perdue”) respectfully moves this Court for a preliminary injunction to enjoin unconstitutional administrative proceedings against Perdue pending in the Office of Administrative Law Judges (“OALJ”) of the United States Department of Labor (“DOL”) pursuant to Federal Rule of Civil Procedure 65. The preliminary injunction should be entered against Defendants Julie Su, in her official capacity as Acting Secretary of Labor; Pamela Kultgen, in her official capacity as an Administrative Law Judge in the OALJ; DOL; and OALJ. In support of this motion, Perdue submits incorporates its Memorandum of Law filed simultaneously with its motion.

Dated: August 20, 2024

Respectfully submitted,

/s/ Margaret Santen

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